

SANDI L. NICHOLS (BAR NO. 100403)  
SHAWN T. COBB (BAR NO. 259654)  
ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
Three Embarcadero Center, 12th Floor  
San Francisco, CA 94111-4074  
Phone: (415) 837-1515  
Fax: (415) 837-1516  
E-Mail: snichols@allenmatkins.com  
scobb@allenmatkins.com

Attorneys for Plaintiff  
MOONLITE ASSOCIATES LLC

STEVEN H. GOLDBERG (BAR NO. 140039)  
PATRICK F. VEASY (BAR NO. 301456)  
MONICA M. BROWNER (BAR NO. 329717)  
STOEL RIVES LLP  
500 Capitol Mall, Suite 1600  
Sacramento, CA 95814  
Phone: (916) 447-0700  
Fax: (916) 447-4781  
E-Mail: steven.goldberg@stoel.com  
patrick.veasy@stoel.com  
monica.browner@stoel.com

Attorneys for Defendant  
CITY OF SANTA CLARA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MOONLITE ASSOCIATES LLC, a Delaware  
limited liability company,

Plaintiff,

v.

CITY OF SANTA CLARA, a municipal  
corporation,

Defendant.

AND RELATED COUNTERCLAIM.

Case No. 5:24-cv-00723-EKL

**JOINT STIPULATION FOR DISMISSAL  
OF ENTIRE ACTION WITH PREJUDICE;  
~~PROPOSED~~ ORDER THEREON**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and Counter-Defendant Moonlite Associates LLC (“Moonlite”) and Defendant and Counterclaimant the City of Santa Clara (the “City”), by and through their respective counsel of record, hereby stipulate to the dismissal of this action in its entirety (both Moonlite’s Complaint against the City [Dkt. No. 1] and the City’s Counterclaim against Moonlite [Dkt. No. 20]) with prejudice, with each party to bear its own attorneys’ fees and costs, and request that the Court enter an Order to that same effect.

**Attestation Per Civil L.R. 5-1(i)(3)**

The filer of this document attests that each other signatory listed below has concurred in the filing of this document.

Dated: March 11, 2025

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

By: /s/Sandi L. Nichols

SANDI L. NICHOLS  
SHAWN T. COBB  
Attorneys for Plaintiff  
MOONLITE ASSOCIATES LLC

Dated: March 11, 2025

STOEL RIVES LLP

By: /s/Patrick F. Veasy

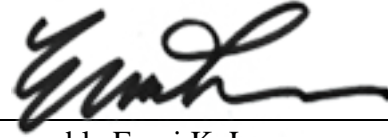
STEVEN H. GOLDBERG  
PATRICK F. VEASY  
MONICA M. BROWNER  
Attorneys for Defendant  
CITY OF SANTA CLARA

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, the Court hereby dismisses this action, in its entirety,  
with prejudice, with each party to bear its own attorneys' fees and costs.

**IT IS SO ORDERED.**

Dated: March 12, 2025



Honorable Eumi K. Lee  
Judge, United States District Court